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CHURCH OF SCIENTOLOGY INTERNATIONAL
9

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 FOR THE COUNTY OF MARIN

12 CHURCH OF SCIENTOLOGY)
INTERNATIONAL, a California)
13 not-for-profit religious)
corporation;)
14)
Plaintiff,)
15)
vs.)
16)
GERALD ARMSTRONG; DOES 1)
17 through 25, inclusive,)
18)
Defendants.)

Case No.

DECLARATION OF
LYNN R. FARNEY IN
SUPPORT OF MOTION
FOR PRELIMINARY
INJUNCTION

WILSON, RYAN & CAMPILONGO
235 Montgomery Street, Suite 450
San Francisco, California 94104

DECLARATION OF LYNN R. FARNY

I, Lynn R. Farny, do declare:

1. I am over 18 years of age and make this declaration of my own personal knowledge and for those matters stated upon information and belief, I believe them to be true and accurate. If called as a witness to testify as to the matters herein, I could and would do so competently.

2. I am corporate Secretary of the Church of Scientology International ("CSI"), a California religious corporation.

3. I am well familiar with Gerald Armstrong, as I have worked in the legal department of CSI since 1984, and prior to that in the legal department of Church of Scientology of California ("CSC"). I have actively followed the events occurring during that time in a lawsuit against Gerald Armstrong by CSC regarding his theft of private documents belonging to the Founder of the Scientology religion.

4. On four separate occasions in November, 1984, Armstrong met with two individuals that he considered to be defectors, whom he knew as "Joey" and "Mike." In reality, both "Joey" and "Mike" were loyal Church members who, with permission from the Los Angeles police, agreed to have their conversations with Armstrong surreptitiously videotaped. I have seen a transcript of the videotaped meeting of November 7, 1984, and during the course of these conversations, Armstrong:

a. Demanded that "Joey" provide him with copies of documents published by the Churches so that he could forge documents in the same style. Armstrong wanted "Joey" to then plant these Armstrong creations in the

1 Church's files so that, should Armstrong tip off the IRS,
2 the incriminating documents would be found in a resulting
3 raid;

4 b. Sought to "set up" the defection of a senior
5 Scientologist by finding a girl to seduce him;

6 c. Told "Joey" all about his conversations with
7 Al Lipkin, an investigator for the CID, and attempted
8 to get "Joey" to call Lipkin and give him false
9 information that would implicate the Church's leaders
10 in the misuse of donations.

11 5. In November, 1984, Armstrong was plotting against the
12 Scientology Churches and seeking out staff members in the Church
13 who would be willing to assist him in overthrowing Church
14 leadership. The Church obtained information about Armstrong's
15 plans and, through a police-sanctioned investigation, provided
16 Armstrong with the "defectors" he sought. On November 30, 1984,
17 Armstrong met with one Michael Rinder, an individual whom
18 Armstrong thought to be one of his "agents" (but who in reality
19 was loyal to the Church). In the conversation, recorded with
20 written permission from law enforcement, Armstrong stated the
21 following in response to questions by Mr. Rinder as to whether
22 they had to have actual evidence of wrongdoing to make
23 allegations against the Church leadership:

24 ARMSTRONG: They can allege it. They can
25 allege it. They don't even have -- they can
26 allege it.

27 RINDER: So they don't even have to have the
28 document sitting in front of them and then --

ARMSTRONG: F___ing say the organization
destroys the documents.

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Where are the -- we don't have to prove a
goddamn thing. We don't have to prove s__t;
we just have to allege it.

6. In another discussion, this one with "Joey," videotaped
on November 7, 1984, Armstrong discussed his plans to destroy his
former religion as follows:

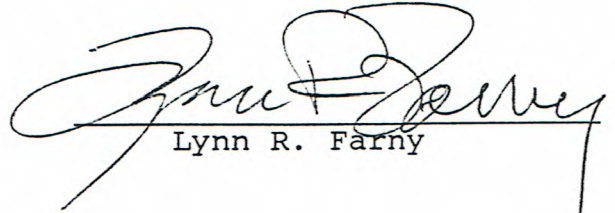
JOEY: Well, you're not hiding!
ARMSTRONG: Huh?
JOEY: You're not hiding.
ARMSTRONG: F--- no! And. . .
JOEY: You're not afraid, are you?
ARMSTRONG: No! And that's why I'm in a f--
king stronger position than they are!
JOEY: How's that?
ARMSTRONG: Why, I'll bring them to their
knees!

7. In another discussion with Michael Rinder, videotaped on
November 17, 1984, Armstrong revealed his true intentions toward
the Church as:

G I am only a relay point in this thing.
However, I do make it my purpose to create as
much shit as possible. You know, hence I
have. . .
M Shit for the organization?
G Yeah, I . . . whatever I do . . . cause
I have no . . . I'm not hooked into anything.

I declare under penalty of perjury under the laws of the
State of California that the foregoing is true and corrected.

Executed in Los Angeles, California the 28th day of
January, 1992.


Lynn R. Farny